

No. 141, Original

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IN THE  
SUPREME COURT OF THE UNITED STATES

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STATE OF TEXAS,

*Plaintiff,*

v.

STATE OF NEW MEXICO AND  
STATE OF COLORADO,

*Defendants.*

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**OFFICE OF THE SPECIAL MASTER**

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**THE STATE OF TEXAS'S NOTICE OF EXHIBIT  
DISCLOSURES AND OBJECTIONS**

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STUART L. SOMACH, ESQ.\*  
ANDREW M. HITCHINGS, ESQ.  
ROBERT B. HOFFMAN, ESQ.  
FRANCIS M. GOLDSBERRY II, ESQ.  
THERESA C. BARFIELD, ESQ.  
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\**Counsel of Record*

October 6, 2021

In response to the Special Master's September 16, 2021 Order regarding Remote Trial Proceedings, the State of Texas provides the following exhibit disclosures and objections for Robert Sloan. As of this filing, the parties anticipate that Mr. Sloan is expected to testify on October 7, 2021. Accordingly, the State of Texas provides the following:

**Attachment 1:** The Robert Sloan cross-examination exhibit index. Please note that there are no objections to the Robert Sloan cross-examination exhibits.

Texas has not disclosed any Robert Sloan direct-examination exhibits at this time.

All exhibits, indexes, and related exhibits have been uploaded to Box.com and are available for the parties to access and download. In an effort to resolve these objections, the parties have met and conferred in good faith. While these objections remain unresolved, the parties believe many of these concerns will be resolved with additional context.

Respectfully submitted,

Dated: October 6, 2021

s/ Stuart L. Somach  
STUART L. SOMACH, ESQ.\*  
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ROBERT B. HOFFMAN, ESQ.  
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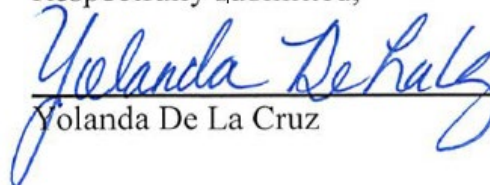
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**CERTIFICATE OF SERVICE**

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This is to certify that on this 6th day of October 2021, I caused a true and correct copy of **THE STATE OF TEXAS'S NOTICE OF EXHIBIT DISCLOSURE AND OBJECTIONS** to be served upon all parties and *amici curiae*, by and through the attorneys of record and/or designated representatives for each party and *amicus curiae* in this original action. As permitted by order of the Special Master, and agreement among the parties, service was effected by electronic mail to those individuals listed on the attached service list, which reflects all updates and revisions through the current date.

Respectfully submitted,

  
Yolanda De La Cruz

Dated: October 6, 2021

**SERVICE LIST FOR ALL PARTIES AND AMICI CURIAE**

**SPECIAL MASTER**

<b>Special Master</b>	<b>Honorable Michael J. Melloy</b> <i>Special Master</i> United States Circuit Judge 111 Seventh Avenue, S.E. Box 22 Cedar Rapids, IA 52401  Michael E. Gans, Clerk of Court United States Court of Appeals – Eighth Circuit Thomas F. Eagleton United States Courthouse 111 South 10th Street, Suite 24.329 St. Louis, MO 63102	<a href="mailto:TXvNM141@ca8.uscourts.gov">TXvNM141@ca8.uscourts.gov</a> (319) 432-6080  <a href="mailto:TXvNM141@ca8.uscourts.gov">TXvNM141@ca8.uscourts.gov</a> (314) 244-2400
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 (Service via Electronic Mail)

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In the Supreme Court of the United States, Original No. 141  
*State of Texas v. State of New Mexico and State of Colorado*

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*State of Texas v. State of New Mexico and State of Colorado*

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# **ATTACHMENT 1**

Texas's Objections to New Mexico's Cross-Examination Exhibits to Robert Sloan

Trial Exhibit	Trial Exhibit No	ProdBeg	ProdEnd	Date	Subject/Title	Category (A, B, C)	Category B Objections (Cite Fed. R. Evid.)	Category C Objections (Cite Fed. R. Evid.)	Offered	Admit (A) /Not Admit (N/A)	Notes
NM	NM-2373				2008 Operating Agreement for the Rio Grande Project	<i>See note</i>					NM-2373 was admitted on 10/4/21
NM	NM-0183	EBID_NM_009836-0001	EBID_NM_009836-0076	1/11/2006	EBID Board of Directors Meeting Minutes - January 11, 2006	A					
NM	NM-0184	EBID_NM_009837-0001	EBID_NM_009837-0074	1/10/2007	EBID Board of Directors Meeting Minutes - January 10, 2007	A					
TX	TX-0320	TX_DEPO-EX_00101342	TX_DEPO-EX_00101345	3/12/2008	EBID Board of Directors Meeting 3/12/2008	A					